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Fountain Wind Project Response to CEC Data Request LU-001

CEC Disposition 2: TN248288-6 Bio Resources contains characterization of the existing site related to timber resources. Appendix B requires discussion of direct impacts. The Timber Study provided in TN251438 addresses the concept of direct impacts by discussing the quantity of timber to be removed with respect to permanent conversion, and temporary effects to be followed by reforestation. The information is sufficient for initiating our analysis. However, there is still some outstanding information needed. Appendix B also requires discussion of indirect impacts, cumulative impacts, and the measures proposed to mitigate any adverse impacts on timber resources. This information is required for a complete analysis regarding the significance of the permanent, and temporary, loss of timber from the project site. Indirect timber impacts are effects that occur in a different place or time than the proposed project, such as the possibility of the Fountain Wind Project's (FWP) timber conversion leading to future timber conversion on adjacent or nearby lands (e.g., Lassen National Forest land or nearby private timber holdings). Cumulative impacts can be addressed by looking at the timber conversion effects, if any, of other feasible development projects (e.g., Hatchet Ridge Wind Project) in the region (i.e., Shasta County), when combined with the FWP's permanent timber loss. The combined impacts on timber resources of multiple projects proposed for the same overall time interval can be significant, whereas the impact of individual projects may not be significant. Measures proposed to mitigate adverse impacts to timber resources, if any, may include approaches such as funding the purchase of forest preserve lands through a recognized non-profit entity such as the Shasta Land Trust or the Nature Conservancy. TN251438 does not provide this information.

Applicant Response 3:

Indirect timber impacts, such as effects that occur in a different place or time than the proposed project, are not anticipated as a result of the project for the following reasons:

- The land on which the project would be developed for wind energy is already commercially harvested for timber. Without the project, it is likely to continue to be harvested for timber because it is heavily forested, privately owned by commercial timber harvesting interests and zoned for timberland production. Further, more acres of commercial timber harvesting would occur in the future without the project than with the project because the project will permanent remove 510 acres of timberland for wind energy production and thus these 510 acres would no longer be available for on-going harvesting activities, thus slightly reducing available timber harvesting acreage in comparison to today.
- There is no evidence that today's on-going timber harvesting activities have resulted in indirect impacts such as by leading to future timber conversion on adjacent or nearby lands (e.g., Lassen National Forest land or nearby private timber holdings). Timber harvesting is not considered "growth-inducing" in that there is no evidence that it encourages or leads to similar activities on adjacent properties. Whether timber harvesting occurs on adjacent properties is influenced more by the presence or absence of marketable timber, whether the land is privately or publicly owned and whether zoning and other regulations allow timber harvesting. As with existing timber harvesting activities, there is no basis to conclude that the small amount of timber harvesting associated with the construction and operation of the project would cause indirect impacts on adjacent parcels.

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The project is also not anticipated to lead to cumulative impacts either from timber harvesting or from timber conversion for the following reasons:

- Cumulative Timber Harvesting. As explained above, the project will result in less timber harvesting in the future than if the project is not constructed because the project will permanently convert 510 acres of land currently available for harvesting activities. As such, if the project is approved, any direct or indirect cumulative impacts related to timber harvesting would be reduced in comparison to today.
- Cumulative Timber Conversion. There is no evidence that the proposed permanent conversion of 510 acres combined with other potential conversions would result in a cumulatively significant loss of harvestable timberland in Shasta County. The amount of land to be permanently lost to timber harvesting is 510 acres. Of the County's 2,428,000 total acres (per the Shasta County General Plan, 2004), 59 percent or 1,454,680 acres are dedicated to commercial forest uses (Shasta County Planning Commission GIS exercise, 2020). The Project would permanently impact 510 acres, which equates to permanent conversion of less than 0.04 percent of commercial forest lands and less than 0.02 percent of total timberland.

Further, there is no evidence that there are or will be a significant number of other projects in Shasta County that would lead to a cumulatively significant conversion of acres of timberland. County zoning prohibits most uses on lands zoned for timber production other than timber harvesting. Prior to 2022, utility scale energy generation was an allowed use on timberlands with a conditional use permit. The zoning rules in existence before 2022 allowed for the construction of the Hatchet Wind project which, according to its EIR (2010), permanently converted 73 acres of timberland. Since 2010, the Applicant is not aware of any other projects that have been approved in Shasta County that have permanently converted large numbers of acres of timberland. (A cumulative projects list was compiled by Shasta County in its 2021 EIR.) As noted, in 2022, the County amended its zoning code to prohibit new utility-scale wind development on almost lands within the County. Given the restrictions on transmission and the difficulty of obtaining approval for new utility-scale wind in Shasta County due to its current zoning regime, the Applicant does not anticipate a significant number of new wind projects that, combined with the proposed project, would result in cumulatively considerable impact on timberlands. Further, given the restrictive zoning for lands zoned for timber production, it is also unlikely that there would many other projects that would result in a significant cumulative conversion of timberland. As such, no mitigation is anticipated to be required for direct, indirect or cumulative impacts to timberland.